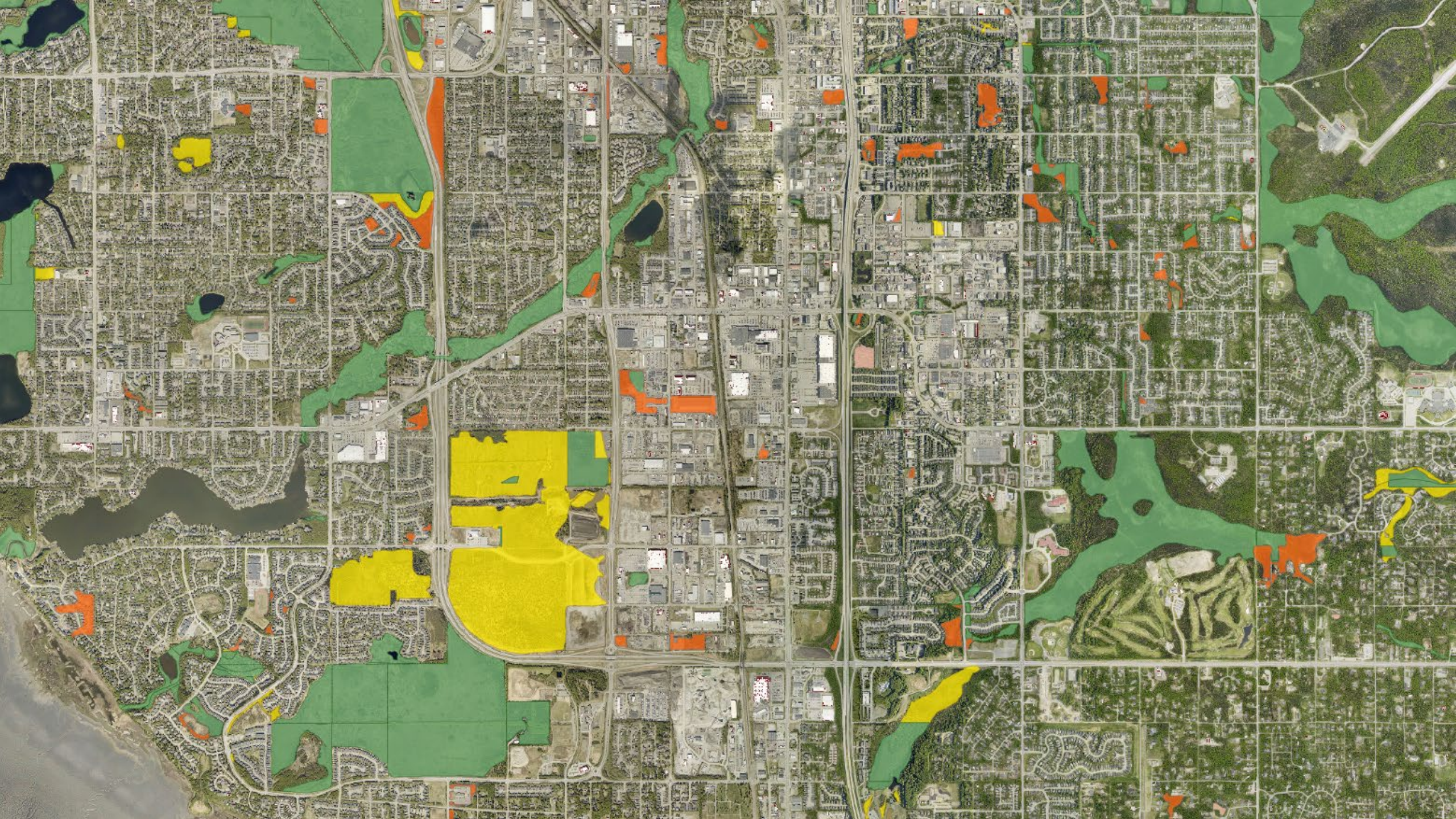




# **PZC Work Session on PZC Case 2026-0036 Updating the Wetlands Management Plan**

**June 8, 2026**





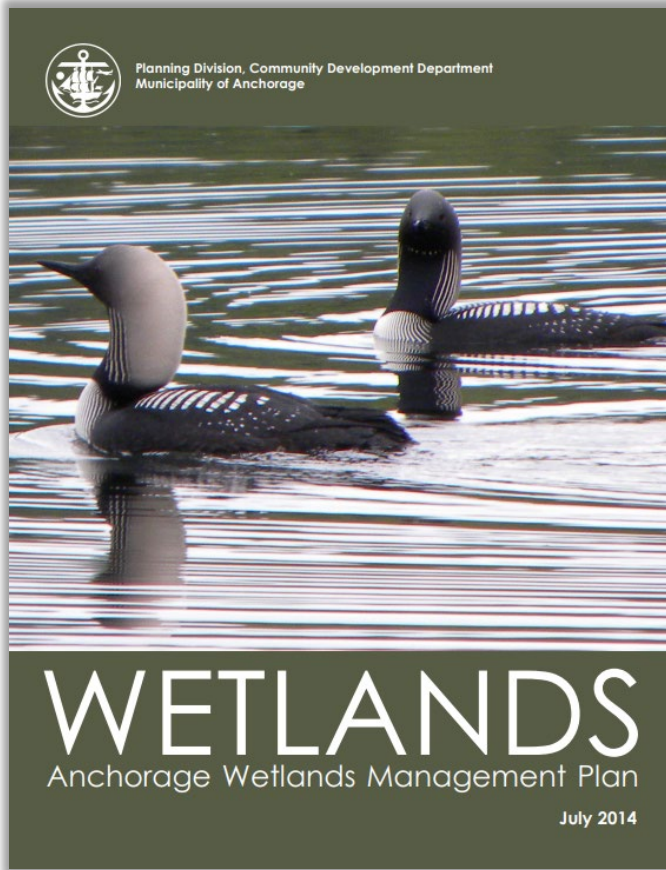
# What Problems Are We Trying to Solve?

- Wetlands permitting is not clear in Anchorage
- The regulatory landscape has changed:
  - ❖ Loss of MOA General Permit in (2021)
  - ❖ Sackett Decision (2023)
- Anchorage Wetlands Management Plan (AWMP) is very specific about who can implement
- AWMP is set up to be both policy guidance and regulatory—they should be separated out
- AWMP mapping is out of date, and map changes require Assembly review and approval

## Context

- Current Anchorage Wetlands Management Plan was adopted in 2014 (AO 2013-132(S)) and is the third successive plan following earlier versions completed in 1982 and 1996.
- The 2014 plan built on both earlier plans by updating wetland mapping, formalizing the wetland classification system and creating a clearer structure for regulatory coordination with U.S. Army Corps of Engineers (USACE) and other agencies.
- In 2021, the U.S. Army Corps of Engineers chose not to renew three Regional General Permits that previously allowed the Municipality to issue general permits for C class wetlands, and so all development projects located in wetlands throughout the Municipality must go to the U.S. Army Corps of Engineers for an authorization to place fill.
- The 2023 Supreme Court decision in Sackett v. EPA narrowed which wetlands are protected under the Clean Water Act, meaning fewer areas that were previously considered wetlands now fall under federal jurisdiction.

# Anchorage Wetlands Management Plan Overview



## Policy guidance/enforceable policies

### Enforceable policies:

1. Unless site-specific policies in Table 4 or exceptions outlined by the Corps of Engineers indicate otherwise, "A" wetlands shall be maintained in their natural state to the maximum extent.
2. A roadway, utility, trail, and park amenity with no practicable, less damaging alternatives and with a demonstrated public need may be allowed in "A" wetlands if wetlands values and functions are maintained to the maximum extent.

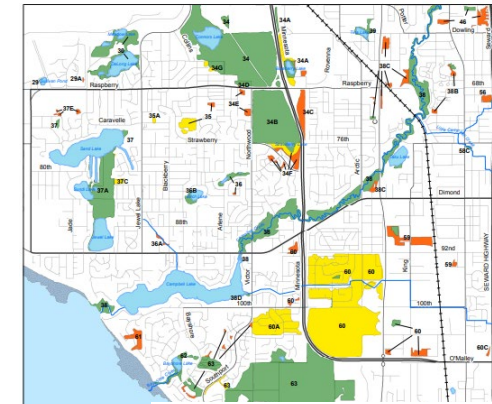
Anchorage Wetlands Management Plan | 27

3. Residential and other development in "A" wetlands, subject to other AWMP policies and state and federal regulatory requirements, shall be considered only when no less damaging alternatives exist and if all economic use of a property would otherwise be precluded.

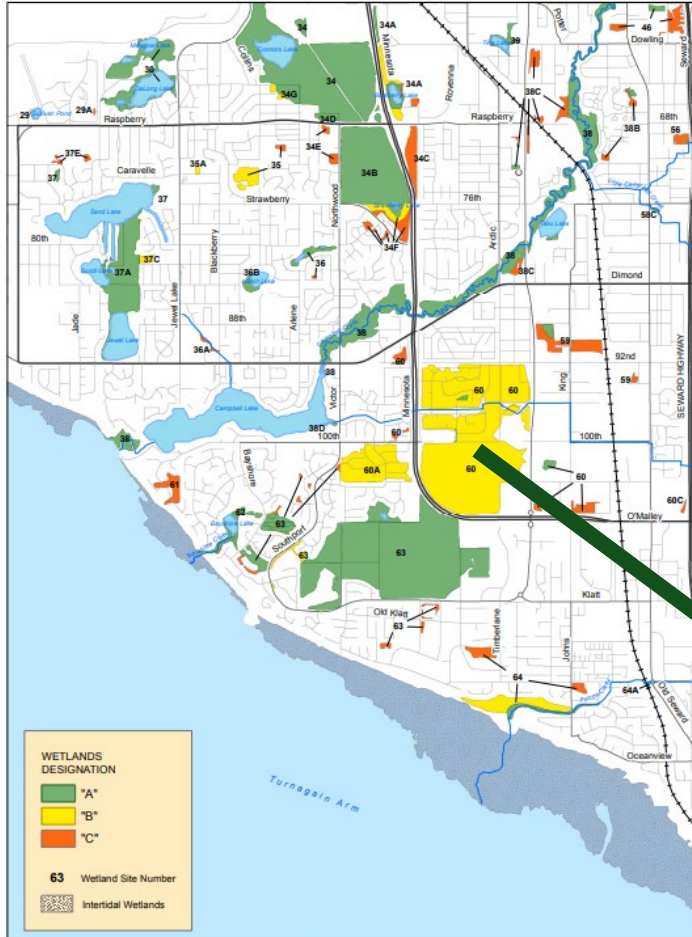
### "B" Wetlands

**DEFINITION:** Within each "B" site, there is typically a mixture of higher and lower values and functions and some portion of these wetlands have a fairly high degree of biological or hydrological functions and site development limitations. They possess some significant resources, but could possibly be marginally developed. The intent of the "B" designation is to conserve and maintain a site's key functions and values by limiting and minimizing fills and development to less critical zones while retaining higher value areas. Development could be permitted in the less valuable zones of a "B" site, provided avoidance and minimization and Best Management Practices are applied to limit disturbance and impacts to the higher value non-fill portions.

## Specific actions for specific wetlands



Site #	Anchorage Wetland Atlas Map #	Management Strategies, Enforceable and Administrative Policies	Designation
60	77	<p>OLD SEWARD HIGHWAY TO C STREET, O'MALLEY TO SOUTH OF 104<sup>th</sup> AVENUE (6.51 acres; Private Ownership) (Scores: Hydrology = 98; Habitat = 56; Species Occurrence = 42; Social Function = 31)</p> <p>"C" wetlands in Maul Industrial Park Subdivision. Values for stormwater attenuation and water quality. COE Jurisdictional Determination and wetlands delineation required.</p> <p><b>General Permit applicable:</b> GP Site Restrictions and Design Criteria: construction timing window; identify surface water features; BMPs for local flooding and stormwater controls required.</p> <p>NE 104<sup>th</sup> AND C STREET (2.72 acres; Private Ownership) (Scores: Hydrology = 95; Habitat = 78; Species Occurrence = 65; Social Function = 13)</p> <p>South Anchorage Target Stone Pond (tract A-11) is preserved by permit. POA-2007-917.</p> <p>Values for filtering, water supply into Klatt Bog system. Moderate bird use concentrated around ponds.</p>	A/C
60 North	76 and 77	<p>EAST OF MINNESOTA DRIVE TO C ST. NORTH OF WEST 100<sup>th</sup> AVENUE TO 92<sup>nd</sup> (150 acres; Public &amp; Private Ownership) (Scores: Hydrology = 131; Habitat = 101; Species Occurrence = 46; Social Function = 39)</p> <p>Values for stormwater and flood attenuation, water quality, size of contiguous habitat; moderate to high migratory habitat; and rare patterned ground wetlands. The site has enhancement possibilities, i.e., daylight the piped stream which is a tributary to Campbell Creek/Lake. Hydrology, habitat, and drainage pattern information shall be required in the permit and platting process. Must retain patterned ground wetlands and integrity of the larger bog to the maximum extent. Area has been problematic because lots exist as a paper plat only with no subdivision improvements. Laurel Acres Subdivision. Tract F is preserved open space. plat #71-44</p>	A/B
60 South	76 and 77	<p>EAST OF MINNESOTA DRIVE TO C STREET/NORTH OF O'MALLEY TO 100<sup>th</sup> (149 acres; Public &amp; Private Ownership) (Scores: Hydrology = 106; Habitat = 98; Species Occurrence = 68; Social Function = 47)</p> <p>Values for stormwater attenuation and water quality; habitat values relative to large size and for open space/aesthetics. Area treats snowmelt and run-off from industrial areas. Development of parcel may consider directing surface water runoff to Klatt Bog drainage ditch to support other efforts to restore Klatt Bog South hydrology. Higher value areas occur along the northern one-third and southwest boundaries of the parcel generally coinciding with areas of ponding. Higher value areas should be retained.</p> <p>Emphasis during the development process should be toward on-site mitigation efforts.</p>	B
60A	76	<p>PATRICIA SUBDIVISION (51 acres; Private Ownership) (Scores: Hydrology = 98; Habitat = 107; Species Occurrence = 79; Social Function = 47)</p> <p>COE Jurisdictional Determination required. Values for stormwater attenuation, and habitat due to larger size. Remaining patterned ground constitutes locally important habitat. Methods shall be utilized to maintain habitat and hydrology connections and to limit the dewatering of core areas. Area has been problematic because lots exist as a paper plat only with no subdivision improvements.</p>	B



Site #	Anchorage Wetland Atlas Map #	Management Strategies, Enforceable and Administrative Policies	Designation
60	77	<p><b>OLD SEWARD HIGHWAY TO C STREET, O'MALLEY TO SOUTH OF 104<sup>TH</sup> AVENUE</b> (6.51 acres; Private Ownership) (Scores: Hydrology = 88; Habitat = 55; Species Occurrence = 42; Social Function = 31)</p> <p>"C" wetlands in Maui Industrial Park Subdivision. Values for stormwater attenuation and water quality. COE Jurisdictional Determination and wetlands delineation required.</p> <p><b>General Permit applicable.</b> GP Site Restrictions and Design Criteria: <i>construction timing window; identify surface water features; BMPs for local flooding and stormwater controls required.</i></p> <p><b>NE 104<sup>TH</sup> AND C STREET</b> (2.72 acres; Private Ownership) (Scores: Hydrology = 95; Habitat = 78; Species Occurrence = 65; Social Function = 13)</p> <p>South Anchorage Target Store Pond (tract A-11) is <b>preserved</b> by permit, POA-2007-917. Values for filtering, water supply into Klatt Bog system. Moderate bird use concentrated around ponds.</p>	A/C
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## Issues with existing plan

- Framework relies on MOA still holding the USACE General Permit
- Plan is both regulatory and policy guidance
- Plan is specific about which divisions of the MOA can enforce
- Regulatory maps are out of date

## Proposal for PZC Case 2026-0036:

- Make needed functional changes
- Change language to allow MOA staff to update the wetlands map without Assembly approval as new verified and approved information becomes available.

*NEW ITEM*

# Proposed Language

## 21.03.070 COMPREHENSIVE PLAN AMENDMENTS

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### B. Levels of Plan Review

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#### 4. Exemption to Wetlands map amendments

a. When a wetland delineation prepared by a qualified professional or by the U.S. Army Corps of Engineers prepared within 5 years of the application shows that on-the-ground wetland boundaries differ from those depicted on the Anchorage Wetlands Management Plan (AWMP) map, the Planning Director may administratively update the AWMP map to reflect the approved delineation without a plan amendment.

b. The applicant or property owner shall submit a copy of the approved or verified delineation which will include the delineation report and survey data to the planning department.

c. Amendments to the wetlands map under this subsection are limited to only adjustments of wetland boundaries on individual parcels and shall not alter wetland management designations, management policies, or regulatory standards.

d. The Planning Department shall maintain a log of all map corrections processed under this subsection and shall report amendments to the Planning and Zoning Commission and the Watershed and Natural Resources Advisory Commission as an informational item .

e. A qualified professional for the purpose of this subsection shall be someone with verifiable training in wetlands delineation and belonging to a recognized national or regional body such as the Society of Wetland Scientists and the Wetlands Training Institute. Acceptance of delineation report from a professional belonging to other lesser-known bodies shall be at the discretion of the Planning Director.

(AO 2012-124(S), 2-26-13; AO 2025-40(S), 4-22-25)

**Other things to talk about**

- **How we will make things work until the plan gets updated**
- **Direction from PZC—should we bring this back as a case in July or August? Any other items we should include?**
- **Looking at the framework of the future plan**

# Big Picture Approaches We Looked At:

<p><b>1. Take over responsibility for all wetlands permitting</b></p>	<p>Pursue new permit with USACE:</p> <ul style="list-style-type: none"> <li>• Timeframe: potentially 2+ years to propose and negotiate; uncertain approval timeframe</li> <li>• Benefits: Would provide new mapping, provide certainty for all permitting, and facilitate more consistent permitting, which could be more efficient for all applicants. Administrative approvals could be under 60 days.</li> <li>• Drawbacks: Long timeline, uncertain if USACE would approve, MOA would need to hire a trained permitter.</li> </ul>
<p><b>2. Permit only wetlands outside the jurisdiction of the Clean Water Act ( CWA)</b></p>	<p>Update mapping and coordinate with USACE on MOA-wide jurisdictional determination:</p> <ul style="list-style-type: none"> <li>• Timeframe: 6 months to update AWMP, uncertain timeframe for USACE concurrence</li> <li>• Benefits: Would address issue wetlands and mapping needs for the entire MOA provide greater predictability for applicants. They would know who had permitting authority for all areas in MOA.</li> <li>• Drawbacks: Potentially long timeframe/uncertainty if USACE would approve.</li> </ul>
<p><b>3.Only improve accuracy of the mapped data.</b></p>	<p>Update mapping timeframe: 6-8 months depending on scale/timing of fieldwork</p> <ul style="list-style-type: none"> <li>• Benefits: Would address mapping needs and potentially alleviate pressure for applicants to complete delineations on their own.</li> <li>• Drawbacks: Potentially long timeframe/uncertainty if USACE would approve.</li> <li>• Does not address permit confusion or timeframes.</li> </ul>
<p><b>4. Discontinue all permitting for any wetlands; take AWMP out of planning considerations.</b></p>	<p>Update plan to remove references or authority and remove reference in planning documents:</p> <ul style="list-style-type: none"> <li>• Timeframe: immediately</li> <li>• Benefits: Removes this process from the MOA workflow.</li> <li>• Drawbacks: Negative environmental impacts from loss of wetlands management and regulation, less ability to use wetlands for green infrastructure functions, potential increase of flooding hazards and risks if development encroaches into wetlands, potential backlash from community</li> </ul>

For Subscribers

# Anchorage Assembly gets preview of \$1.3B infrastructure liability that keeps worsening

By Zachariah Hughes

Published: May 24, 2026



# MOA Wetlands Permit Process - DRAFT

## Acronyms:

MOA – Municipality of Anchorage  
 USACE – U.S. Army Corps of Engineers  
 AWMP – Anchorage Wetlands Management Plan  
 WNRC – Watershed and Natural Resources Advisory Commission

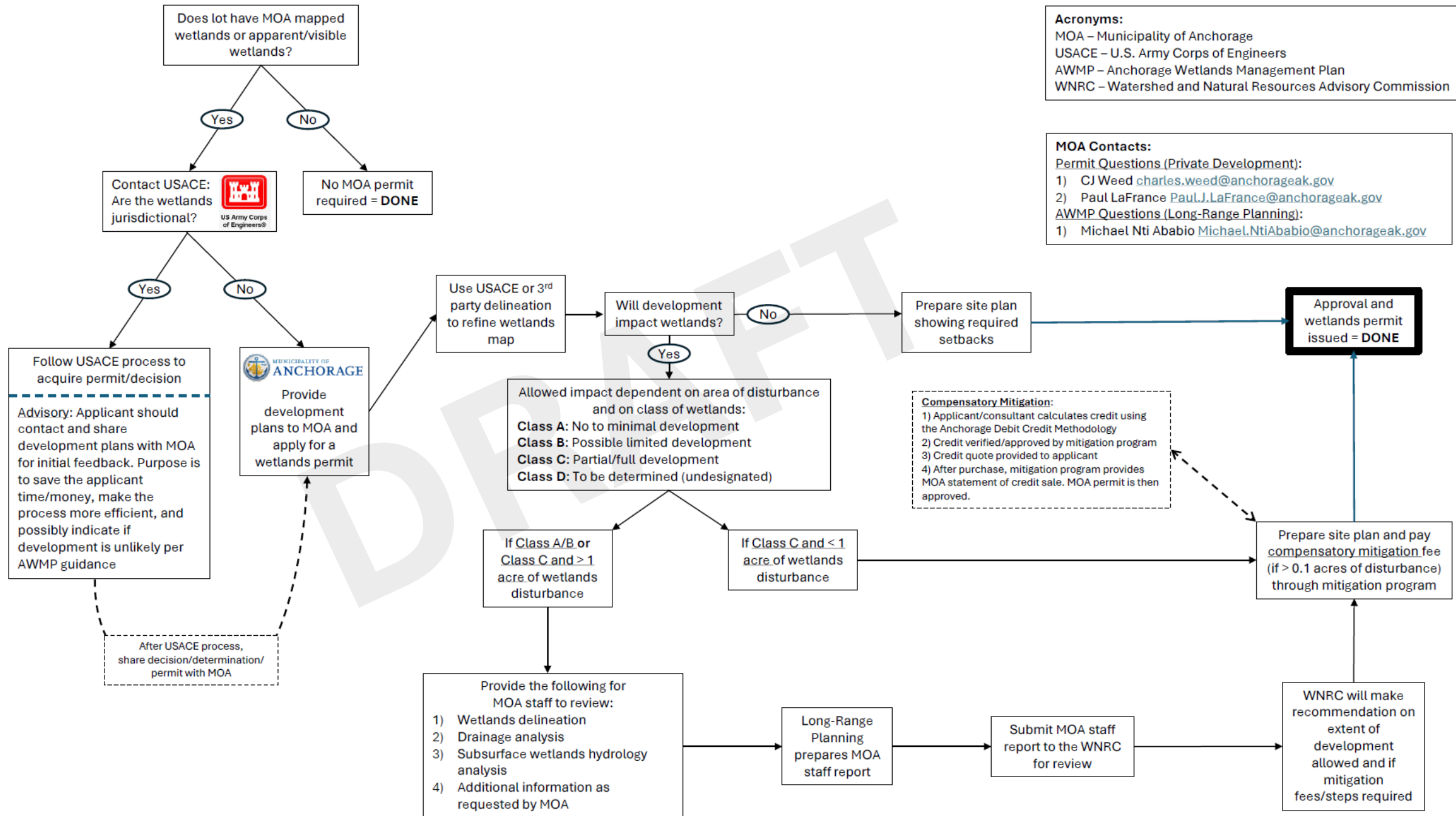
## MOA Contacts:

### Permit Questions (Private Development):

- 1) CJ Weed [charles.weed@anchorageak.gov](mailto:charles.weed@anchorageak.gov)
- 2) Paul LaFrance [Paul.J.LaFrance@anchorageak.gov](mailto:Paul.J.LaFrance@anchorageak.gov)

### AWMP Questions (Long-Range Planning):

- 1) Michael Nti Ababio [Michael.NtiAbabio@anchorageak.gov](mailto:Michael.NtiAbabio@anchorageak.gov)



# Questions?



# Thank you

